## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

PEARL IP LICENSING LLC,

Plaintiff,

Case No. 6:20-cv-00350-ADA

v.

AT&T CORP.; AT&T COMMUNICATIONS, LLC; AT&T MOBILITY LLC; AND AT&T SERVICES, INC.,

Defendants.

## CONSENT MOTION TO STAY ALL DEADLINES PENDING FINAL SETTLEMENT

Now comes Plaintiff, Pearl IP Licensing, LLC, by and through its undersigned counsel, and advises the Court that an Agreement that wholly, or at least substantially, resolves the present case is near finalization and it is anticipated that the Agreement will be wholly executed in the next two weeks. Based on certain confidential consideration terms, Plaintiff anticipates that it can dismiss the present case within the next sixty (60) days, but, because of various issues, including the upcoming holidays, the case would not be in a position to be dismissed much earlier than January 20, 2021.

NOW THEREFORE, Plaintiff, with the consent of the Defendants, respectfully requests that all pending deadlines be continued for an additional 60 days, until and including January 20, 2021. This stay is not sought for the purpose of delay but so that justice may be served.

Dated: November 20, 2020 Respectfully submitted,

/s/George Pazuniak George Pazuniak (PHV) O'Kelly & Ernst LLC 824 N. Market Street, Suite 1001A Wilmington, DE 19803 302-478-4230 gp@del-iplaw.com

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Attorneys for Plaintiff

## **CERTIFICATE OF CONFERENCE**

I certify that the undersigned counsel conferred with counsel for Defendants and counsel for Defendants do consent to this motion.

/s/George Pazuniak George Pazuniak (PHV)

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 20, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/George Pazuniak
George Pazuniak (PHV)